



ANDREW S. PHIPPS

Office of the Secretary
Federal Communications Commission
Disability Rights Office
9300 East Hampton Drive
Capitol Heights, MD 20743

Received & Inspected
JAN 18 2012
FCC Mail Room

January 17, 2012

Re: Petition for Undue Burden Exemption from Closed Captioning Rules

To Whom It May Concern:

This letter requests an exemption on behalf of Phipps Gospel Sing from the FCC's closed captioning rules based on undue burden. The original and two copies and all support are being provided.

Phipps Gospel Sing is a donor-supported organization. Since 1982 we have produced a weekly 30-minutes and currently a 60-minutes television program. The program inspires viewers through great southern style Gospel music and is produced locally by WIWU Television and its staff. It is broadcast to the public on WHMB-TV 40 throughout Central Indiana. Phipps Gospel Sing pays WHMB-TV 40 \$ 400.00 per week to air the show over its broadcast facilities.

Captioning the program would present an undue burden for several reasons:

1. We do not have the financial resources to caption the program ourselves. Our research has determined it would cost \$5,000-8,000 to purchase the necessary equipment and we are unable to take on that cost at this time.
2. Being a small entity, a few volunteers do production and the additional expertise and manpower to caption each program are not available.
 - 3 We have also explored closed captioning services. This would cost an additional \$250 per week or \$13,000 per year. The added cost for captioning would make production of the program unaffordable and the time for captioning would make meeting WHMB-TV's airdate deadlines impossible.
 - 4 WHMB-TV does not provide closed captioning and has said it is unlikely to do so in the foreseeable future because of the additional time and staff that would be required.
 - 5 As a small entity we are in the process of soliciting sponsorships to pay for the cost of closed captioning, but have been unsuccessful to this point.



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Providing closed captioning would ultimately cause us to terminate or severely limit production of the program and cause us to lose supporters who would no longer be able to regularly view the program. While Phipps Gospel Sing recognizes the importance closed captioning can have, based on the above facts set forth in this letter, we respectfully request that Phipps Gospel Sing be granted an undue burden exemption from the captioning requirements.

Respectfully:

PHIPPS GOSPEL SING

By: _____

Printed Name: _____

Title: _____



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JAN 18 2012

FCC Mail Room

Andrew Phipps
Host/Producer

The Phipps Gospel Show
P.O. Box 2099
Muncie, IN 47307-0099

January 16, 2012

Mr. Phipps,

This letter is in response to your request for LeSEA Broadcasting to research the process and cost associated with closed captioning your television program that currently airs on WHMB-TV.

There are two ways to approach this issue:

- Purchase the captioning software/hardware and do the closed captioning yourself. Research by both the WHMB-TV production and engineering staffs has discovered the cost of this equipment will be in the \$5,000-8,000 range. The CC process involves multiple steps. First, the program must be transcribed word-for-word into an electronic document. Second, the script is entered in the CC software. Third, the software drops the script onto a timeline of the program. Fourth, the program can then be outputted with the embedded CC. In our experience, we've noted that it takes 4-6 hours to CC a 30-minute program such as yours.
- Outsource the closed captioning to an outside provider. Again, we've researched this solution and have discovered the cost to be approximately \$250 per program.

WHMB-TV does not currently offer in-house closed captioning services. Because closed captioning is such a labor-intensive process, we would have to hire additional staff to perform this task and that is not economically feasible at this time.

I hope this information answers your questions about the closed captioning process and the associated costs. Please don't hesitate to contact me with any further questions.

Sincerely,

Cathy Clossin
WHMB-TV



Andrew Phipps
Host/Producer
The Phipps Gospel Show
P.O. Box 2099
Muncie, IN 47307-0099

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WHMB-TV